



Zero Waste Detroit

May 20, 2014

Honorable Chair Aric Nesbit
State Representative
House Committee on Energy and Technology

Dear Chairman Nesbit and distinguished members of the Committee:

On behalf of the more than 20 organizations of Zero Waste Detroit, representing thousands of members in the state of Michigan, we are writing in opposition to House Bill 5025, a bill which would amend 2008's PA 295 to classify incineration as renewable energy and allow for new waste incinerators.

Zero Waste Detroit opposes HB 5205 because:

1. Qualifying additional waste incineration technologies as renewable would dilute Michigan's Renewable Portfolio Standard. Burning trash competes with legitimate renewable energy such as wind and solar. HB 5205 would dilute the standard and negate the impact of the RPS in driving the development of renewable energy. Financial subsidies to incineration would undermine less expensive, more sustainable approaches to waste reduction and energy generation. Michigan has closed all 159 incinerators burning medical waste and reduced the number of solid waste burners to a few. Rather than expand incineration as "renewable energy," legislators should now amend the definition of renewable waste in PA 295 to exclude energy generated by existing incinerators "grandfathered in" as renewable energy.

2. Waste incinerators are one of the costliest forms of energy generation. According to the US Energy Information Administration, the capital costs for waste incinerators are 60% more than nuclear power, and over twice that of coal. Operating and maintenance costs of WTE plants are four times more than nuclear power and ten times more than coal power plantsⁱ.

3. Waste incinerators are inefficient producers of electricity. Due to the low calorific value of waste, incinerators are only able to make small amounts of energy while destroying large amounts of reusable materials. While older incinerators generate electricity at very low efficiency rates of 19-27%, a recent UK study found that conversion efficiencies of new incineration technologies are even lower.ⁱⁱ

4. Waste incinerators create one-tenth as many jobs as recycling, on a ton-by-ton basis. Over 90% of materials disposed in US incinerators and landfills can be readily recycled or composted. If the US were to recycle 75% of its discarded materials, over 1.5 million new jobs could be createdⁱⁱⁱ.

5. Waste Incineration is not a form of renewable energy. Renewable energy, as defined by the U.S. Energy Information Administration, is an energy source that is regenerative or virtually inexhaustible. Waste incineration consists of discarded materials such as plastics made from petroleum, which are not renewable. Burning these materials in order to generate electricity creates a demand for "waste" and discourages much needed efforts to conserve resources, reduce packaging and waste and encourage recycling and composting. More than 90% of materials currently disposed of in incinerators and landfills can be reused, recycled and composted^{iv}.

6. *Waste incinerators undermine efforts to fight climate change.* According to the US EPA, incineration produces more CO₂ per megawatt hour than any other form of power generation, including coal, the dirtiest fossil fuel. Incineration emits nearly 25% more CO₂ per unit of electricity than coal (WTE: 2988 lbs/MWh CO₂ compared with coal: 2249 lbs/MWh CO₂)⁹.

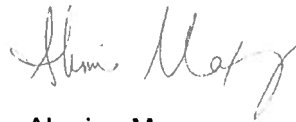
7. *Waste incineration negatively impacts quality of life for those living nearby.* The Detroit Renewable Power Waste Incinerator has received 9 notices of violation from the Michigan Department of Environmental Quality from 2011-2013 because of odor nuisance. This has a negative impact on the quality of life of those nearby and the odor hampers the city of Detroit's revitalization. No one wants to live in an area that smells of garbage.

Zero Waste Detroit strongly supports the use of Michigan's Renewable Portfolio Standard to spur investment in renewable resources that help reduce our dependence on fossil fuels, improve our environment, and provide long-term stability and sustainability for our energy system. **We oppose inclusion of waste incineration as a renewable energy source, as well as the broadening of the renewable energy definition to include new waste incinerators. We urge a NO vote on House Bill 5205.**

Sincerely,



Margaret Weber
Convener, Zero Waste Detroit
313-938-1133



Ahmina Maxey
Outreach Coordinator, Zero Waste Detroit
313-986-2990

For Zero Waste Detroit:

*Coalition for Community Change
Detroit Audubon Society
Detroit Catholic Pastoral Alliance
Detroitters Working for Environmental Justice
East Michigan Environmental Action Council
Ecology Center
Freedom Freedom
Great Lakes Bioneers Detroit
Great Lakes Environmental Law Center
Green Door Initiative
Greenacres Woodward Civic Association
Institute for Local Self-Reliance
Lemieux Consulting & Bright Recycling Services
Michigan Environmental Council
Rosedale Recycles
Sierra Club Environmental Justice Program
Sierra Club Southeast Michigan Group
Southwest Detroit Environmental Vision
Sugar Law Center for Economic and Social Justice
Voices for Earth Justice
We Want Green, Too!
48217 Community & Environmental Health Organization*

cc: House Energy & Technology Committee Members

ⁱ U.S. Energy Information Administration (Department of Energy), Updated Capital Cost Estimates for Electricity Generation Plants, November 2010. http://www.eia.gov/oiaf/beck_plantcosts/pdf/updatedplantcosts.pdf

ⁱⁱ Fichtner Consulting Engineers Limited, The Viability of Advanced Thermal Treatment in the UK, 2004, p.4.

ⁱⁱⁱ Platt, Brenda et al, Stop Trashing the Climate, ILSR, Eco-Cycle & GAIA, 2008

Sources:

^{iv} Platt, Brenda et al, Stop Trashing the Climate, ILSR, Eco-Cycle & GAIA, 2008

^v U.S. EPA, <http://www.epa.gov/cleanenergy/energy-and-you/affect/air-emissions.html>

^{vi} Institute for Local Self-Reliance factsheet, <http://www.ilsr.org/wp-content/uploads/2012/02/oppose-sb690-factsheet1.pdf>